

August 18, 2008

Ms. Kathrina M. Donegan
Air Pollution Control Program
St. Louis County Health
111 South Meramec Avenue
Clayton, Missouri 63105

REC'D
AUG 20 2008
APCO

**Re: Revised Semi-Annual NSPS Monitoring Report
Bridgeton Landfill, LLC, 189-0312**

Dear Ms. Donegan:

On behalf of Bridgeton Landfill, LLC, enclosed is the Revised Semi-Annual Report for the Title V Operating Permit (OP2001009), in accordance with New Source Performance Standards for Municipal Solid Waste Landfills 40 CFR 60 Subpart WWW (NSPS), for the period January 1, 2008 through June 30, 2008.

I certify based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate and complete.

If you have any questions, please contact Allen Steinkamp at (314)739-5099 or Lina Klein of Aquaterra Environmental Solutions at (573) 442-6391.

Sincerely,

ALLIED WASTE SERVICES



Tony Rosback
Market Vice President

Ms. Kathrina M. Donegan

August 18, 2008

Page 2 of 2

C: Mr. Bob Randolph, MDNR-APCP

Ms. Patricia Scott, EPA Region VII

Allen Steinkamp, Environmental Manager, Bridgeton Landfill, LLC

Rick Walker, Site Manager, Bridgeton Landfill, LLC



MISSOURI DEPARTMENT OF NATURAL RESOURCES
AIR POLLUTION CONTROL PROGRAM
COMPLIANCE CERTIFICATION AND MONITORING REPORT
PART 70 OPERATING PERMIT

PART 1 - INSTALLATION INFORMATION AND CERTIFICATION

FIPS NO.	189	PLANT NO.	0312
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INSTALLATION NAME	BRIDGETON LANDFILL, LLC
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INSTALLATION LOCATION (STREET ADDRESS AND CITY)	13570 ST. CHARLES ROCK ROAD, BRIDGETON, MO 63044
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OPERATING PERMIT NUMBER	DATE OPERATING PERMIT ISSUED
OP2001009 (RENEWAL APPLICATION SUBMITTED 8/6/04)	2/7/01

TYPE OF REPORT

<input type="checkbox"/> ANNUAL COMPLIANCE CERTIFICATION	<input checked="" type="checkbox"/> SEMI-ANNUAL MONITORING REPORT	<input type="checkbox"/> EXCEEDANCE REPORT
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IF ANNUAL COMPLIANCE CERTIFICATION, IS THE ANNUAL COMPLIANCE CERTIFICATION BEING SUBMITTED TO ALSO FULFILL THE REPORTING REQUIREMENTS FOR THE SEMI-ANNUAL MONITORING REPORT?
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<input type="checkbox"/> YES	<input type="checkbox"/> NO
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REPORTING PERIOD START DATE	REPORTING PERIOD END DATE
01/01/08	6/30/08

	RESPONSIBLE OFFICIAL	PERMIT CONTACT PERSON
Name	TONY ROSBACK	ALLEN STEINKAMP
Title	MARKET VICE PRESIDENT	ENVIRONMENTAL MANAGER
Mailing Address	13570 ST. CHARLES ROCK ROAD, BRIDGETON, MO 63044	13570 ST. CHARLES ROCK ROAD, BRIDGETON, MO 63044
Telephone Number	(314)739-5099	(314) 739-5099

HAS THE ABOVE INFORMATION CHANGED SINCE THE ISSUANCE OF THE OPERATING PERMIT?	
<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO

CERTIFICATION STATEMENT

I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate and complete.*

SIGNATURE OF RESPONSIBLE OFFICIAL	DATE SIGNED
	8/18/2008

PRINT NAME OF RESPONSIBLE OFFICIAL
TONY ROSBACK

*This certification means that the signatory has verified compliance with all applicable regulations and operating permit conditions, and that the installation has complied with all monitoring, record keeping, reporting and testing conditions specified in the operating permit unless specified differently in a deviations report. For information concerning administrative and civil penalties, please consult Section 643.085 of the Revised Statutes of the State of Missouri (RSMo) and Section 643.151 RSMo, respectively.



MISSOURI DEPARTMENT OF NATURAL RESOURCES
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PART 2

FIPS NO.

189

PLANT NO.

0312

INSTALLATION NAME

BRIDGETON LANDFILL, LLC

REPORTING PERIOD

01/01/08-6/30/08

1. PLANT-WIDE PERMIT CONDITIONS

DID THE INSTALLATION EXPERIENCE ANY DEVIATIONS DURING THE REPORTING PERIOD FROM THE PLANT-WIDE PERMIT CONDITIONS?

☒ YES ☐ NO

2. EMISSION UNIT PERMIT CONDITIONS

DID THE INSTALLATION EXPERIENCE ANY DEVIATIONS DURING THE REPORTING PERIOD FROM THE EMISSION UNIT PERMIT CONDITIONS?

☐ YES ☒ NO

3. CORE PERMIT REQUIREMENTS

DID THE INSTALLATION EXPERIENCE ANY DEVIATIONS DURING THE REPORTING PERIOD FROM THE CORE PERMIT REQUIREMENTS?

☐ YES ☒ NO

4. GENERAL PERMIT REQUIREMENTS

DID THE INSTALLATION EXPERIENCE ANY DEVIATIONS DURING THE REPORTING PERIOD FROM THE GENERAL PERMIT REQUIREMENTS?

☒ YES ☐ NO

NOTE: If you checked "Yes" in any of the four deviation questions above, and the installation has not previously reported the deviations, the installation must complete Part 3 of the Compliance Certification and Monitoring Report Form.



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PART 3 - DEVIATIONS FROM REQUIRED MONITORING

FIPS NO. 189			PLANT NO. 0312		INSTALLATION NAME BRIDGETON LANDFILL, LLC			
REPORT PERIOD START DATE 1/1/08			REPORT PERIOD END DATE 6/30/08					
PERMIT CONDITION	POLLUTANT	MONITORED LEVEL	MONITORING METHOD	DEVIATION DESCRIPTION	DEVIATION DATE	DEVIATION DURATION	CAUSE OF DEVIATION	CORRECTIVE ACTION
SEE ENCLOSED NSPS & MACT REPORTS								
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Operation & Maintenance Plan	Flares down during testing period.	4/11/2008	1.12 hours	Control Device Not Operational	The enclosed flare was non-operational from approximately 10:33 to 11:40 on 4/11/08 while conducting testing. Flare #2 was manually started approximately 1 hour later
PW006 - Monitoring Condition 3	NMOC	N/A	Continuous Monitoring System	Landfill gas flow and temperature not recorded	5/12/2008	5.87 hours	Continuous Monitoring System Recorder Not Operational	The circle chart recorders were disconnected while installing variable frequency drives and digital chart recorders. Recording resumed approximately 5.87 hours later
PW006 - Monitoring Condition 3	NMOC	N/A	Continuous Monitoring System	Landfill gas flow and temperature not recorded	5/16/2008	9.25 hours	Continuous Monitoring System Recorder Not Operational	The circle chart recorders were disconnected while installing variable frequency drives and digital chart recorders. Recording resumed approximately 5.87 hours later
PW006 - Monitoring Condition 3	NMOC	N/A	Continuous Monitoring System	Landfill gas flow and temperature not recorded	5/19/2008	4 hours	Continuous Monitoring System Recorder Not Operational	The circle chart recorders were disconnected while installing variable frequency drives and digital chart recorders. Recording resumed approximately 5.87 hours later



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PART 3 - DEVIATIONS FROM REQUIRED MONITORING								
FIPS NO. 189			PLANT NO. 0312		INSTALLATION NAME BRIDGETON LANDFILL, LLC			
REPORT PERIOD START DATE 1/1//08					REPORT PERIOD END DATE 6/30/08			
PERMIT CONDITION	POLLUTANT	MONITORED LEVEL	MONITORING METHOD	DEVIATION DESCRIPTION	DEVIATION DATE	DEVIATION DURATION	CAUSE OF DEVIATION	CORRECTIVE ACTION
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	1/9/2008	9.5 hours	Low Temperature	The continous chart recorder indicated that Flare #2 operated at a temperature below the compliance temperature during portions of the first two quarters of 2008. The issue was resolved at the beginning of April, and the flare has operated at temperatures above the compliant temperature since that time
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	1/11/2008	5.75 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	1/11/2008	14.5 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	1/13/2008	84 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	1/17/2008	25.5 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	1/18/2008	235.75 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	1/29/2008	54.25 hours	Low Temperature	



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PART 3 - DEVIATIONS FROM REQUIRED MONITORING								
FIPS NO. 189			PLANT NO. 0312		INSTALLATION NAME BRIDGETON LANDFILL, LLC			
REPORT PERIOD START DATE 1/1/08				REPORT PERIOD END DATE 6/30/08				
PERMIT CONDITION	POLLUTANT	MONITORED LEVEL	MONITORING METHOD	DEVIATION DESCRIPTION	DEVIATION DATE	DEVIATION DURATION	CAUSE OF DEVIATION	CORRECTIVE ACTION
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/1/2008	30.5 hours	Low Temperature	The continuous chart recorder indicated that flare #2 operated at a temperature below the compliance temperature during portions of the first two quarters of 2008. The issue was resolved at the beginning of April, and the flare has operated at temperatures above the compliant temperature since that time
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/2/2008	18.5 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/5/2008	5 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/6/2008	22.75 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/8/2008	7.5 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/8/2008	10.5 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/9/2008	116 hours	Low Temperature	



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PART 3 - DEVIATIONS FROM REQUIRED MONITORING								
FIPS NO. 189			PLANT NO. 0312		INSTALLATION NAME BRIDGETON LANDFILL, LLC			
REPORT PERIOD START DATE 1/1/08					REPORT PERIOD END DATE 6/30/08			
PERMIT CONDITION	POLLUTANT	MONITORED LEVEL	MONITORING METHOD	DEVIATION DESCRIPTION	DEVIATION DATE	DEVIATION DURATION	CAUSE OF DEVIATION	CORRECTIVE ACTION
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/14/2008	4 hours	Low Temperature	The continuous chart recorder indicated that flare #2 operated at a temperature below the compliance temperature during portions of the first two quarters of 2008. The issue was resolved at the beginning of April, and the flare has operated at temperatures above the compliant temperature since that time.
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/17/2008	189.25 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	2/25/2008	379.75 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	3/12/2008	9.75 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	3/14/2008	357.5 hours	Low Temperature	
General Permit Condition 1.(V)(II)(D)	NMOC	N/A	Control Device	Temperature below compliance temperature	4/1/2008	15.75 hours	Low Temperature	
PW006 - Reporting Condition 1	NMOC	N/A	Operation & Maintenance Plan	Failure to Submit required Exceedance reports	1/1/08-6/30/08	N/A	incidents of high O2, high temp, positive pressure	Deviations from monitored parameters were provided to SLCDOH 7/21/08



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PART 3 - DEVIATIONS FROM REQUIRED MONITORING								
FIPS NO. 189			PLANT NO. 0312		INSTALLATION NAME BRIDGETON LANDFILL, LLC			
REPORT PERIOD START DATE 1/1/08			REPORT PERIOD END DATE 6/30/08					
PERMIT CONDITION	POLLUTANT	MONITORED LEVEL	MONITORING METHOD	DEVIATION DESCRIPTION	DEVIATION DATE	DEVIATION DURATION	CAUSE OF DEVIATION	CORRECTIVE ACTION
PW006 - Recordkeeping	NMOC	N/A	Operation & Maintenance Plan	Failure to keep up-to-date, readily available onsite records of control equipment compliance monitoring	3/1/08-5/31/08	N/A	Technician on site was unaware of the location of the hard copy of the data	Wellhead data for months of March and April provided to SLCDOH 7/1/08. The appropriate personnel were informed of where to locate all data.



MISSOURI DEPARTMENT OF NATURAL RESOURCES
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PART 4

FIPS NO. 189 PLANT NO. 0312

INSTALLATION NAME
BRIDGETON LANDFILL, LLC

REPORTING PERIOD
01/01/08 - 6/30/08

WERE THERE ANY OTHER MONITORING DEVIATION (EXCESS EMISSION) REPORTS SUBMITTED TO THE MISSOURI DEPARTMENT OF NATURAL RESOURCES- AIR POLLUTION CONTROL PROGRAM DURING THIS REPORTING PERIOD?
☒ YES ☐ NO (IF YES, SUBMIT A COPY OF THE REPORT OR COMPLETE THE DEVIATION REPORT SUMMARY BELOW)

PERMIT CONDITION	REPORTING REQUIREMENT	DATE REPORT SUBMITTED TO THE DEPARTMENT
SEE ATTACHED NSPS AND MACT REPORTS		
PW006 Reporting Condition 7	Submit NSPS semiannual report of records; report includes deviations from 10 CSR 10-5.490	7/30/08 (Reporting period 1/1/08 - 6/30/08)
	Submit SSM events in accordance with site's SSM Plan; report includes SSM events	7/30/08 (Reporting period 1/1/08 - 6/30/08)
General Permit Condition 1.(II)(A)(1)	Submit Title V Semi Annual Report	7/30/08 (Reporting period 1/1/08-6/30/08)
General Permit Condition 1.(V)(II)(D)		Exceedance Reports for the following reporting periods: Reporting period 11/12/07 - 1/4/08; Reporting period 6/6/08; Reporting period 3/11/08 - 3/12/08; Reporting period 3/26/08; Reporting period 5/11/08 - 5/12/08; Reporting period 5/25/08 - 5/30/08; Reporting period 6/30/08

Startup, Shutdown, Malfunction Events

Bridgeton Landfill

Type of Event	Equipment Affected	Date/Time	Startup Date/Time	Duration	Cause of Event
Malfunction	Continuous Monitoring System	1/3/08 13:05	1/3/08 14:10	1:05:00	Continuous Monitoring System Malfunction - Flow Recorder
Malfunction	Continuous Monitoring System	2/6/08 6:52	2/6/08 13:52	7:00:00	Continuous Monitoring System Malfunction - Flow Recorder
Malfunction	Continuous Monitoring System	3/11/08 19:09	3/12/08 9:12	14:03:00	Continuous Monitoring System Malfunction - Flow Recorder
Malfunction	Continuous Monitoring System	3/26/08 6:57	3/26/08 8:17	1:20:00	Continuous Monitoring System Malfunction - Flow Recorder
Shutdown	Control Device	4/11/08 8:33	4/11/08 9:28	0:55:00	Maintenance
Shutdown	Control Device	4/11/08 9:50	4/11/08 9:53	0:03:00	Maintenance
Shutdown	Control Device	4/11/08 9:57	4/11/08 10:00	0:03:00	Maintenance
Shutdown	Control Device	4/11/08 10:33	4/11/08 11:40	1:07:00	Maintenance
Shutdown	Control Device	4/14/08 10:27	4/14/08 11:05	0:38:00	Maintenance
Shutdown	Control Device	4/24/08 11:48	4/24/08 11:48	0:00:00	Maintenance
Shutdown	Control Device	4/24/08 14:59	4/24/08 15:01	0:02:00	Maintenance
Shutdown	Control Device	4/28/08 10:53	4/28/08 10:55	0:02:00	Maintenance
Malfunction	Control Device	5/11/08 7:30	5/12/08 6:25	22:55:00	Loss of phase
Malfunction	Control Device	5/12/08 10:25	5/12/08 10:45	0:20:00	Maintenance
Malfunction	Continuous Monitoring System	5/12/08 10:45	5/12/08 16:37	5:52:00	Continuous Monitoring System Malfunction - Flow Recorder
Shutdown	Control Device	5/13/08 16:00	5/13/08 17:00	1:00:00	Maintenance
Shutdown	Control Device	5/15/08 10:37	5/15/08 11:17	0:40:00	Maintenance
Malfunction	Continuous Monitoring System	5/16/08 7:30	5/16/08 16:45	9:15:00	Continuous Monitoring System Malfunction - Flow Recorder
Malfunction	Continuous Monitoring System	5/19/08 10:25	5/19/08 14:25	4:00:00	Continuous Monitoring System Malfunction - Flow Recorder
Malfunction	Control Device	5/25/08 10:00	5/27/08 6:45	44:45:00	Loss of phase
Shutdown	Control Device	5/29/08 11:45	5/30/08 8:00	20:15:00	Maintenance
Shutdown	Control Device	6/30/08 12:25	6/30/08 13:25	1:00:00	Maintenance